The Environmental Results Program (ERP)

An EPA/State Collaborative Opportunity

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Today's Presentation Will:

- Outline ERP approach and tools
- Discuss States' ERP experience
- Identify ERP benefits, performance results, and environmental outcomes
- Describe ERP assistance opportunities

Why is the U.S. EPA Involved?

- ERP represents a high potential to improve environmental performance and benefit small businesses
- ERP presents partnership opportunities among co-regulators and businesses
- ERP offers state-to-state and state-to-local collaboration options

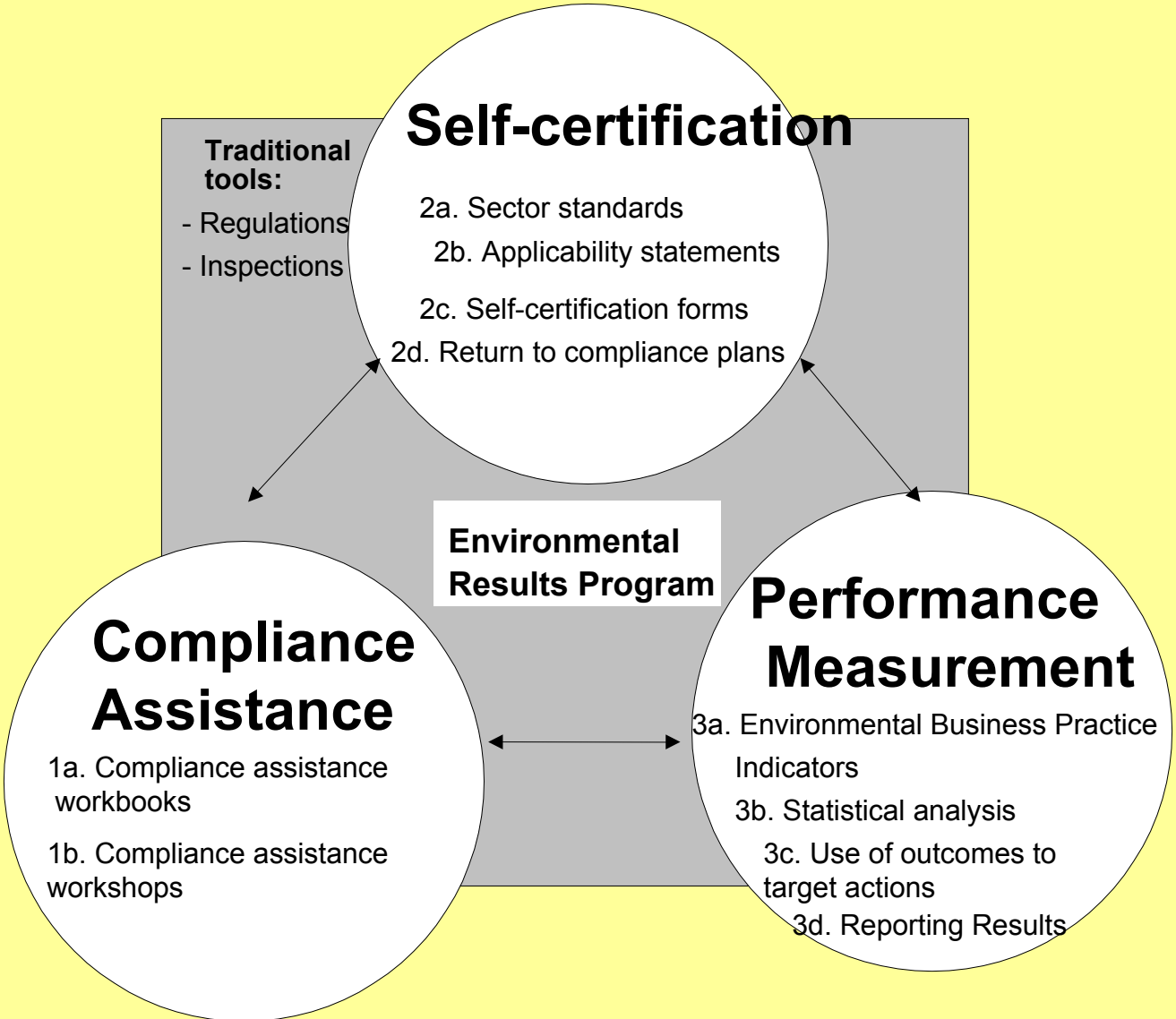
Why ERP?

- Enhance and measure performance of facilities/whole business sectors
- Use limited resources more efficiently
- Develop sustainable regulatory system
- Address cumulative impact of a large number of small sources

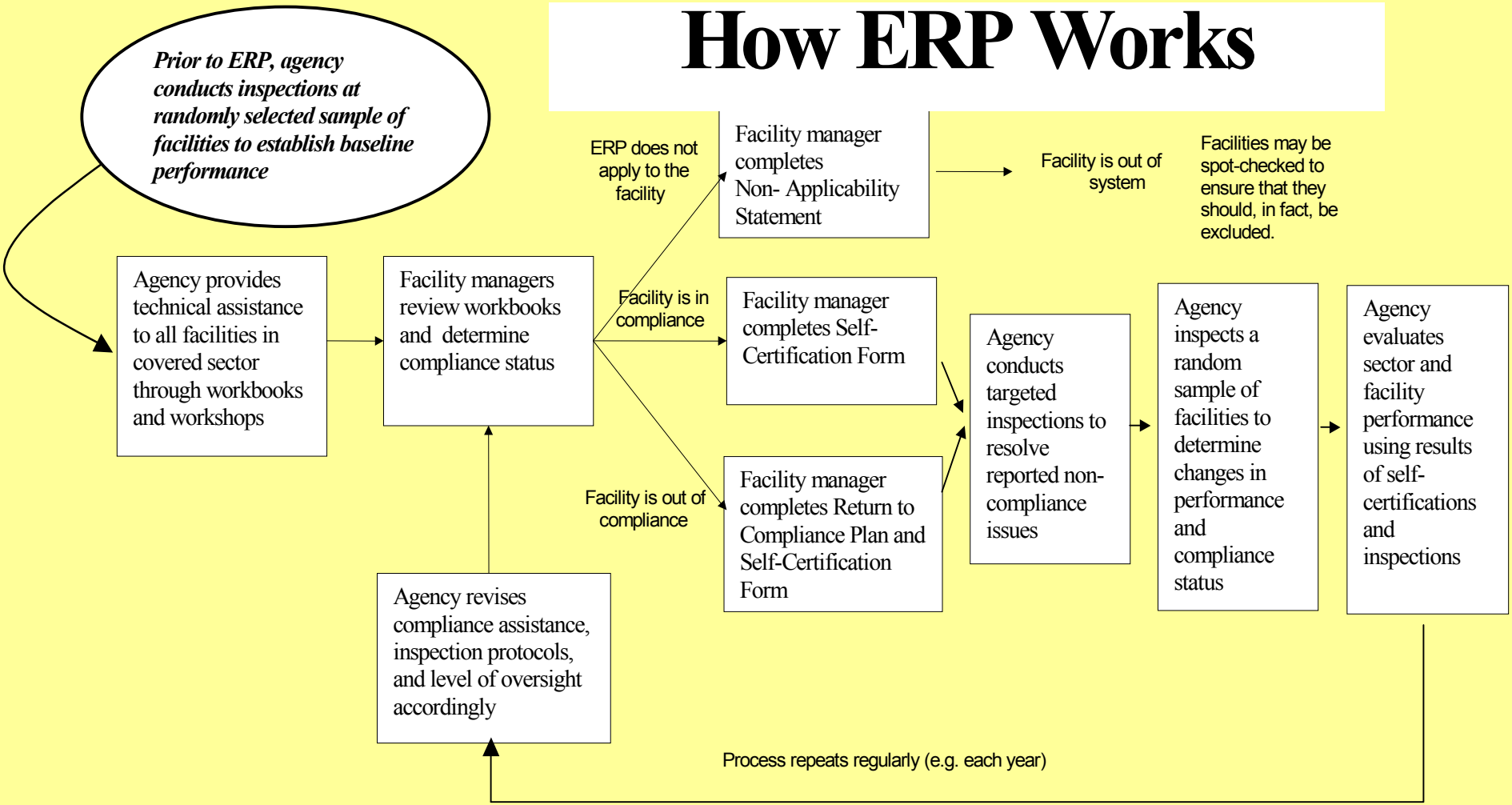
  - Dry cleaner universe equivalent to 60 HAP Majors

  - Printer universe equivalent to 17 VOC Majors

What is ERP?


Traditional tools:
- Regulations
- Inspections
Self-certification
2a. Sector standards
2b. Applicability statements
2c. Self-certification forms
2d. Return to compliance plans
Environmental Results Program
Compliance Assistance
1a. Compliance assistance workbooks
1b. Compliance assistance workshops
Performance Measurement
3a. Environmental Business Practice Indicators
3b. Statistical analysis
3c. Use of outcomes to target actions
3d. Reporting Results

How ERP Works



What States have ERP Projects?

- Massachusetts: Printers, photo processors, dry cleaners, industrial boilers and wastewater tanks, Stage II Vapor Recovery,
- Rhode Island: Auto body repair shops, Underground Storage Tanks, and Stage II Vapor Recovery
- Florida: Auto repair shops and auto salvage yards
- Maryland, Delaware, and the District of Columbia: Auto repair shops
- Tennessee and Georgia: Underground Storage Tanks
- Maine: Auto salvage yards

Small Business Benefits from ERP

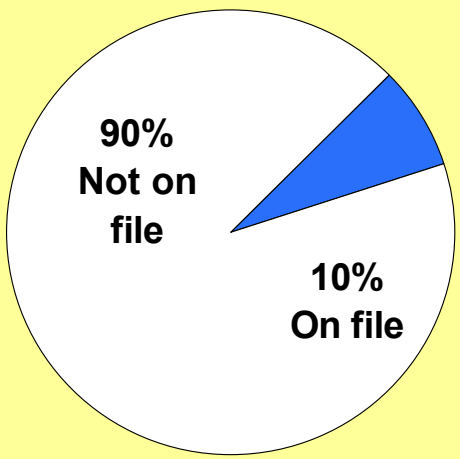
- ✓Fee consolidation and cost reduction
- ✓More easily understood regulations
- ✓Clear accountability
- ✓Greater regulatory flexibility
- ✓Improved environmental awareness

Massachusetts Return to Compliance Plans

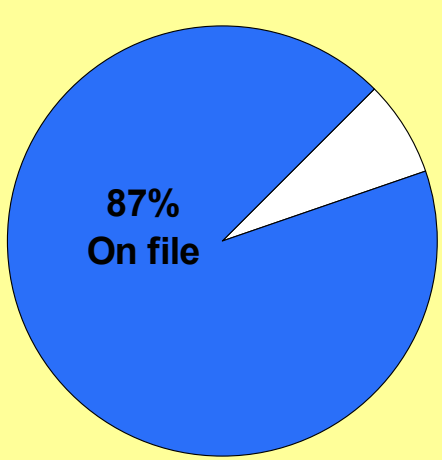
Dry Cleaners (Unv 660)	62	16	4	3
Photo Processors (Unv 550)	57	35	22	20
Printers	X	66	16	9

BASELINE UNIVERSE IDENTIFICATION for Massachusetts Dry Cleaners

Percentage of facilities “in the system”



BEFORE
1996



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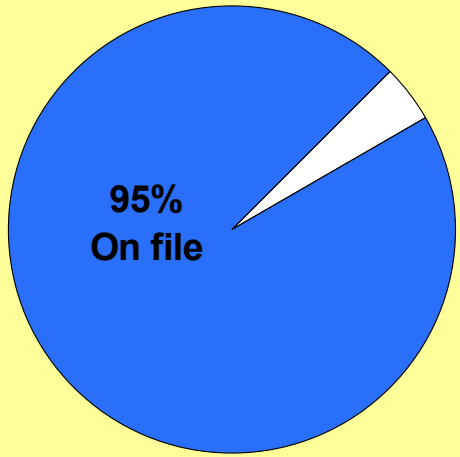
AFTER
1997



2%
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2000

ERP Measurement Methodology

- Statistically valid compliance inspections (baseline and yearly); random and targeted
- Environmental Business Practice Indicators
- Score (e.g., facility, industry, indicator)

EBPI's for ERP Printers

Regulatory Indicators:

*Are the fountain solutions used on offset web-fed lithographic presses alcohol-free? (air)

* Printer meeting 2ppm or hauling? (water)

* Is the facility in compliance with quantity and time limits for HW storage? (waste)

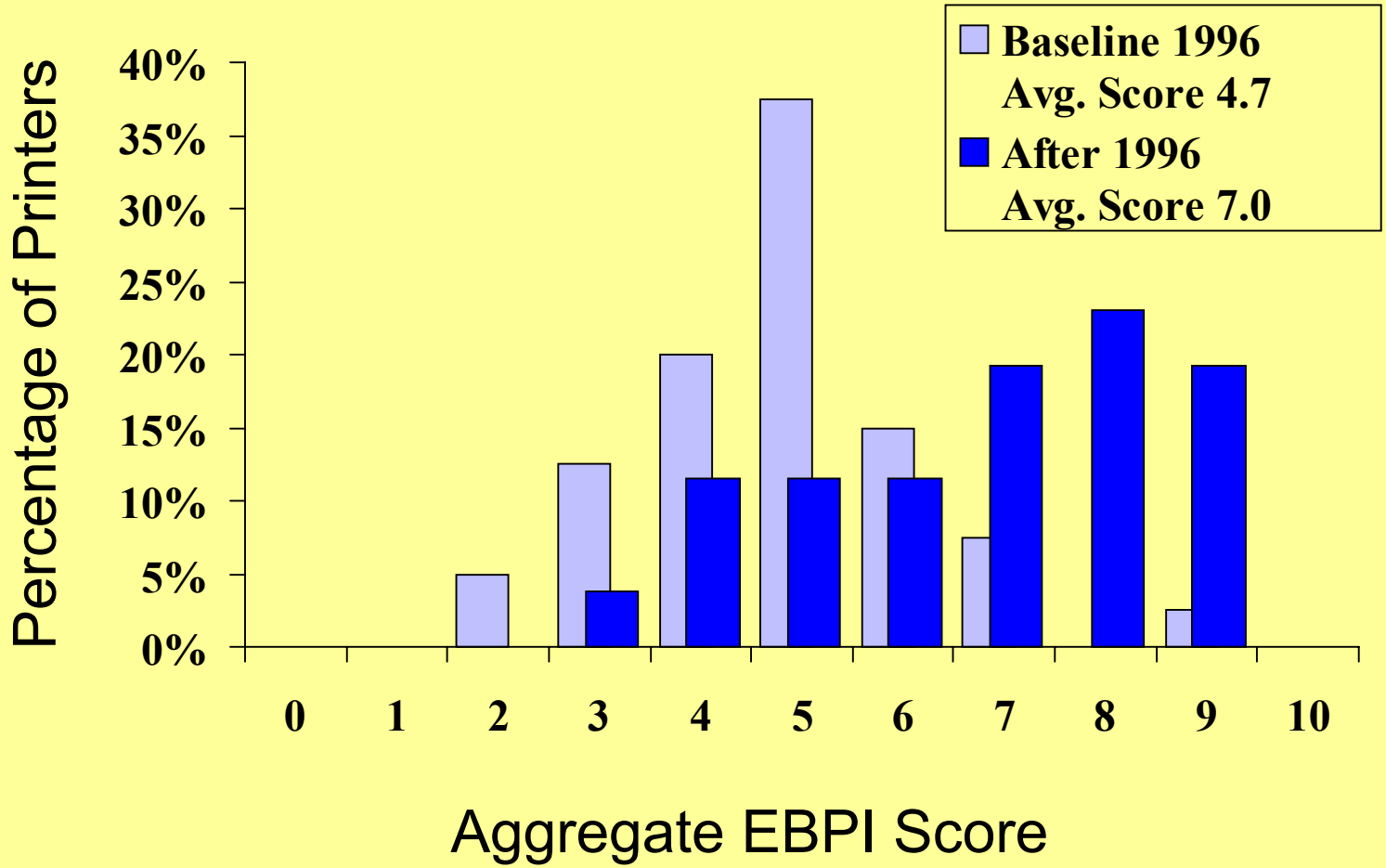
Beyond Compliance Indicators:

* Does printer have a sign prohibiting discharge of process chemicals over sinks in work areas? (P2)

* Does printer recycle aluminum printing plates? (P2)

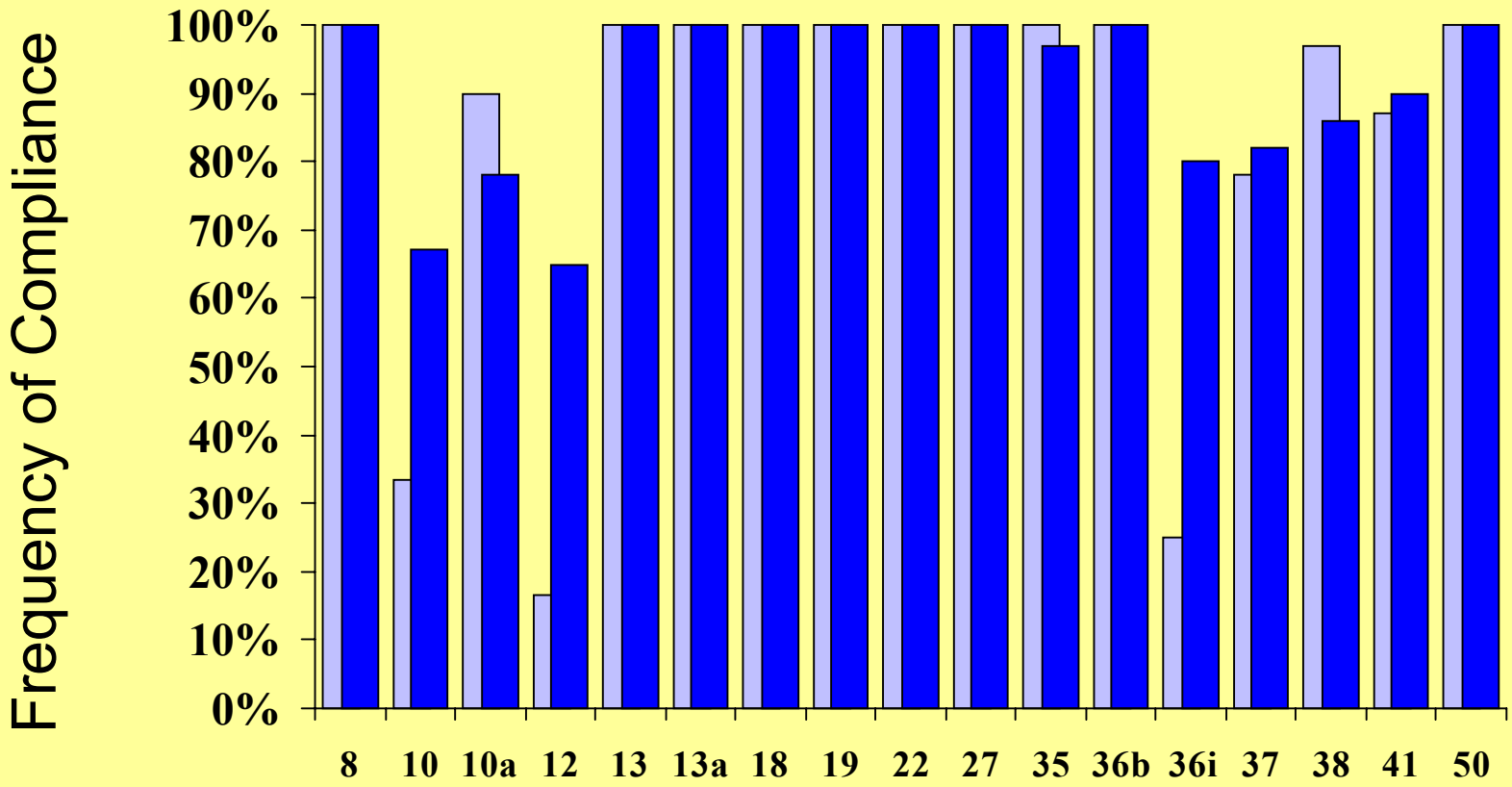
PRINTER'S PARTNERSHIP

Aggregate EBPI Analysis



Massachusetts Dry Cleaners

Individual EBPI Analysis



1997 vs. 2000

EBPI PERFORMANCE RESULTS

Dry Cleaner EBPI: Facility Has Emergency Procedures in Place

Performance increased **from 25%** at baseline **to 80%**. Apply this change to the entire universe: **358** more facilities with emergency procedures in place.

Dry Cleaner EBPI: Containers in Good Cond. & Kept Closed

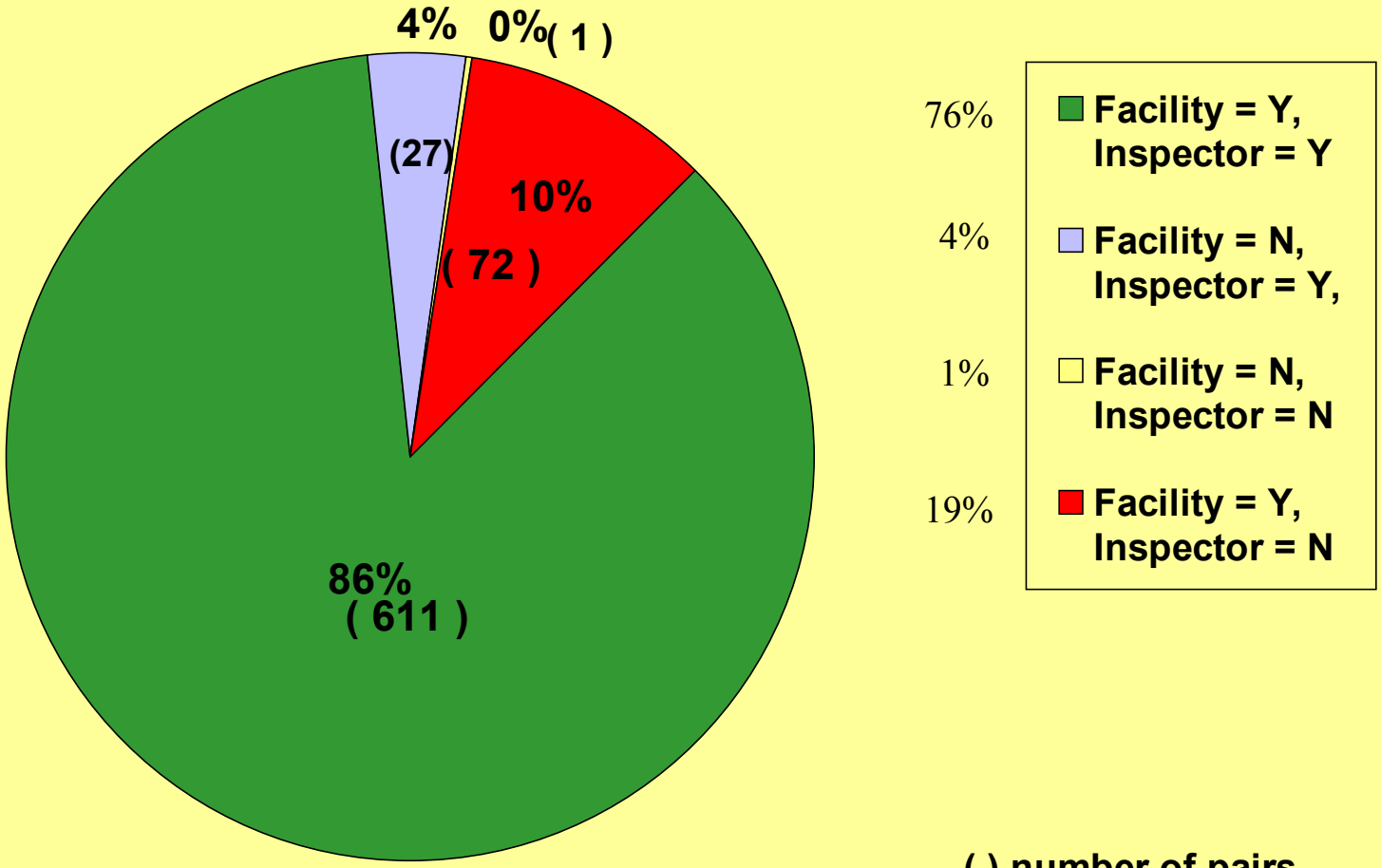
Performance decreased by **3%** from baseline (or roughly **20** more dry cleaners have inadequate container management).

Photoprocess EBPI: Meeting 2ppm Silver Discharge

Performance increased **from 60%** at baseline to **98%** in 1998. MA DEP can account for **98%** of all silver generated from photoprocessors in Massachusetts.

Dry Cleaner Accuracy Analysis

Self-Certifications vs. Inspections



( ) number of pairs

2000

SELECT ENVIRONMENTAL OUTCOMES

- *Dry Cleaners:* "Is leak detection performed weekly, following workbook protocol and using proper leak detection equipment?"

  Result: Performance increased **from 33%** at baseline in 1997 to **66%** in 2000. Based on avg. perc use per facility, applied to entire universe, this is equivalent to **22.5 ton reduction** of perc emissions.

- *Printers:* "Are you in compliance with the press cleanup solution requirement?"

  Results: Performance increased **from 77%** at baseline in 1998 to **85%** in 1999. Apply this to entire universe, this is equivalent to **4.0 tons VOC reduction**

What ERP Assistance Can EPA Provide?

- State Innovation Grant Program (*www.epa.gov/innovation/stategrants*)
- Project planning through contractor assistance
- Invitational travel support
- Technical document preparation
- Coordination among EPA Headquarters and Regional Offices

Where is ERP information?

- U.S. EPA Website: *epa.gov/permits*
- MA DEP Website: *state.ma.us/dep/erp*
- FL DEP Website: *dep.st.fl.us/waste/categories/hazardous/pages/autocert.htm*
- RI DEM Website: *state.ri.us/dem/programs*

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